

# EXHIBIT 2

and Operations Department for Wisdom Marine Lines Co., Ltd. Tina Lai, Mr. Tsao's supervisor, and Mike Chao, COO of Wisdom Marine Lines Co., Ltd., were also involved and aware of the withdrawal.

**INTERROGATORY NO. 4:** Please identify all communications between Wisdom Marine and/or Amis Integrity SA (and/or others acting on their behalf) and 24Vision Chartering Solutions DMCC (hereinafter "24Vision") with respect to the withdrawal of the M/V AMIS INTEGRITY on or about July 11, 2019.

**ANSWER:** Defendant objects to Interrogatory No. 4 to the extent "Wisdom Marine" is vague and ambiguous as there are multiple "Wisdom Marine" entities and to the extent it implies that the M/V AMIS INTEGRITY was withdrawn from the charter between Amis Integrity S.A. and 24Vision Chartering Solutions on or before July 11, 2019. Defendant asserts that the M/V AMIS INTEGRITY was timely withdrawn on July 12, 2019. Subject to and without waiving the objections, Defendant refers Plaintiff to the email correspondence produced in response to Request for Production 1 (Originally Request 4 a.) and provides the following summary. The following summary is not intended as a substitute for the emails produced hereunder, but is merely intended to identify responsive communications: On July 8, 2019 Curly Tsao by email provided a Grace Period Notice of intent to withdraw the Vessel from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire, and received confirmation of transmission; on July 12, 2019 at 13:56 and 14:00 (Taiwan time) Mr. Tsao by emails provided notice of withdrawal directly to 24Vision Chartering Solution and via broker Eddie Lin; on July 12, 2019 at 14:36 (Taiwan

time) Mr. Tsao received confirmation of transmission of the notice of withdrawal to 24Vision Chartering Solutions from Mr. Lin.

**REQUEST FOR PRODUCTION NO. 1:** Please provide copies of all written communications between Wisdom Marine/Amis Integrity SA/or others acting on their behalf and 24Vision between July 8-12 regarding the withdrawal of the M/V AMIS INTEGRITY.

**RESPONSE:** Renamed “Request for Production No. 1” for clarity. Defendant objects to Request for Production No. 1 (originally Request 4 a.) to the extent “Wisdom Marine” is vague and ambiguous as there are multiple “Wisdom Marine” entities. Subject to and without waiving the objection, please see documents previously filed with the Court and documents produced herewith.

**REQUEST FOR PRODUCTION NO. 2:** Please provide a complete original copy of the e-mail titled “Notice of Withdrawal” dated July 12, 2019 between Wisdom Marine and 24 Vision and others (Exhibit 3 to Jang Declaration).

**RESPONSE:** Renamed “Request for Production No. 2” for clarity. Please see documents produced in response Request for Production No. 1 (originally Request 4 a.), which include Curly Tsao’s July 12, 2019 13:56 email notice and his July 12, 2019 14:00 email notice.

**INTERROGATORY NO. 5:** Please identify all communications between Wisdom Marine/Amis Integrity SA (and brokers or other acting on their behalf) regarding negotiations and discussions for the chartering of the M/V AMIS INTEGRITY during the

period of July 8-12, 2019.

**RESPONSE:** Defendant objects to Interrogatory No. 5 to the extent “Wisdom Marine” is vague and ambiguous as there are multiple “Wisdom Marine” entities, to the extent it may be interpreted to reach attorney-client privileged communications, and to the extent communications regarding the chartering of the Vessel during this time period are irrelevant as the Vessel was properly withdrawn from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire. Subject to and without waiving the objections, Defendant refers Plaintiff to the email correspondence produced in response to Request for Production 3 (Originally Request 5 a.) and provides the following summary. The following summary is not intended as a substitute for the emails produced hereunder, but is merely intended to identify responsive communications: on July 8, 2019 at 17:57 (Taiwan time) Mike Chao was informed by email that an entity named “Norden” was interested in chartering the Vessel; on July 11, 2019 at 8:29 a.m. Mike Chao was informed by email that an entity named “United Bulk Carriers” was interested in chartering the Vessel; on July 12, 2019 at 9:29 a.m. broker YG Lin by email provided a “recap” to Mike Chao, Tina Lai, and Curly Tsao regarding “main terms agreed so far” with United Bulk Carriers International S.A.; on July 12, 2019 at 22:10 broker YG Lin confirmed to Mike Chao, Tina Lai, Curly Tsao, and Huan Jang the Vessel’s fixture to a charter with United Bulk Carriers International S.A.

**REQUEST FOR PRODUCTION NO. 3:** Please provide copies of all communications between Wisdom Marine/Amis Integrity SA/or others acting on their behalf between July 8 and July 12 regarding negotiations and discussions about chartering the M/V



**AMIS INTEGRITY**

**RESPONSE:** Renamed “Request for Production No. 3” for clarity. Defendant objects to Request for Production No. 3 (originally Request 5 a.) to the extent “Wisdom Marine” is vague and ambiguous as there are multiple “Wisdom Marine” entities, to the extent it may be interpreted to reach attorney-client privileged communications, and to the extent communications regarding the chartering of the Vessel during this time period are irrelevant as the Vessel was properly withdrawn from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire. Subject to and without waiving the objections, please see documents produced herewith.

**REQUEST FOR PRODUCTION NO. 4:** Please provide the exact time and date of all circulars/e-mails (and provide copies thereof) to brokers and/or prospective charterers of the M/V AMIS INTEGRITY between July 8 and July 11, 2019.

**RESPONSE:** Renamed in part “Request for Production No. 4” for clarity. Defendant objects to Interrogatory 5 b./Request for Production No. 4 (originally Request 5 b.) to the extent such “circulars/e-mails” to brokers and/or prospective charterers during this time period are irrelevant as the Vessel was properly withdrawn from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire. Subject to and without waiving the objections, please see responses to Interrogatory Nos. 4 and 5 and documents produced in response to Request for Production Nos. 1 (originally Request 4 a.) and 3 (originally Request 5 a.).

**INTERROGATORY NO. 6:** Please list the names of individuals at Wisdom Marine

**VERIFICATION**

HSUEH, BRUCE YICHUN verify in accordance with the Supplemental Rules for Admiralty or Maritime Claims as follows:

That I am an officer of Defendant Amis Integrity S.A. in the above-entitled action. I acknowledge that I have read the foregoing interrogatories and answers thereto, know the contents thereof, believe the same to be true and correct, and verify, under perjury of the Laws of the United States of America, that the foregoing is true and correct.

AMIS INTEGRITY S.A.

By:  \_\_\_\_\_